



25th May, 2023

The Listing Department, The Calcutta Stock Exchange Ltd. 7, Lyons Range, Kolkata – 700001	The Manager The Department of Corporate Services, BSE Limited, P. J. Towers, Dalal Street, Mumbai - 400001	The Manager, The Listing Department, National Stock Exchange of India Limited, Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400051
Scrip Code- 022035	Script Code- 531241	Symbol- LINC

Dear Sir,

Re : Annual Secretarial Compliance Report

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08.02.2019 and Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 we enclose herewith copy of the Annual Secretarial Compliance Report for the year ended March 31, 2023 certified by Mr. D. C. Sahoo of D. C. Sahoo & Co., Company Secretaries.

This is for your information and record.

Thanking You

Yours faithfully

For LINC LIMITED

KAUSHIK RAHA
Company Secretary



SECRETARIAL COMPLIANCE REPORT
of M/s. LINC LIMITED, (formerly Linc Pen & plastics Limited)

CIN: : L36991WB1994PLC065583

FOR THE YEAR ENDED 31ST MARCH, 2023

[Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
The Board of Directors,
M/S. LINC LIMITED (formerly Linc Pen & plastics Limited)
CIN: L36991WB1994PLC065583
Registered Off: Aurora Water Front, 18th Floor,
GN 34/1, Sector-V, Salt Lake, Kolkata- 700091

We have examined:

- a) All the documents and records made available to us and explanations provided by your Company i.e. LINC LIMITED;
- b) the filings/submissions made by the company to the Stock Exchanges;
- c) Website of the Company;
- d) any other documents/filings, as may be relevant, which has been relied upon to prepare this Certificate, for the financial year ended on March 31, 2023 (review period) in respect of Compliance with the provisions of:
 - i. The Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the Regulations, Circular, Guidelines issued thereunder and;
 - ii. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under and the Regulations, Circular, Guidelines issued thereunder by the Securities & Exchange Board of India (SEBI);
- e) The specific Regulations whose provisions and the Circulars/Guidelines issued thereunder have been examined, includes –
 - (i) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
 - (ii) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable for the period**
 - (iii) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - (iv) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (v) The Securities and Exchange Board of India (Share Based Employees Benefits) Regulations, 2014/SEBI (Share Based Employees Benefits and Sweat Equity) Regulations, 2021; **Not Applicable for the period**



(vi) The Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021; **Not Applicable for the period**

(vii) Securities and Exchange Board of India (Buy back of Securities) Regulations, 2018; **Not Applicable for the period**

(viii) Securities and Exchange Board of India (Issue and listing of Debt Securities) Regulations, 2008; **Not Applicable for the period**
and circulars/ guidelines issued there under

and based on the above examination, We hereby report that, during the Review Period, the compliance status of the entity is appended below:

Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The Compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 a	Yes	
2.	Adoption and timely updation of the Policies: • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes Yes	
3.	Maintenance and disclosures on Website: • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website	Yes yes yes	
4.	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under section 164 of Companies Act, 2013 as confirmed by the listed entity.	yes	
5.	Details related to Subsidiaries of listed entities have been examined w.r.t. : (a) Identification of material subsidiary companies (b) Discloser requirement of material as well as other subsidiaries	NA NA	



6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR regulations, 2015.	Yes	
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes.	
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions, or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	For all the RTP's prior approval was taken
9.	Disclosure of events information: The listed entity provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	
10.	Prohibition of insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11	Actions taken by SEBI or stock Exchange (s), if any: No action(s) has been taken against the listed entity/ Its promoters/directors subsidiaries either by SEBI Or by stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various Circulars) under SEBI Regulations and circulars / Guidelines issued thereunder except as provided under Separate paragraph herein (**)	Yes	No action taken against the listed entity/ its promoters /directors/subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and Circulars/ guidelines issued thereunder during the year under review.
12	Additional Non-compliances, if any : No additional non-compliance observed for all SEBI Regulation/circular/guidance note etc.	Yes	No any additional non-compliance observed for all SEBI regulation /circular / guidance note etc. during the year under review.



The additional disclosure of Annual Secretarial Compliance Report below:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of action	Details of Violation	Fine Amount	Observation / Remarks of the practicing Company Secretary	Management Response	Remark
-----NOT APPLICABLE-----										

(b) The listed entity has taken the following actions to comply with the observations made in Previous report:

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of action	Details of Violation	Fine Amount	Observation / Remarks of the practicing Company Secretary	Management Response	Remark
-----NOT APPLICABLE---										

Assumption & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of Financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the effectiveness with which the management has conducted the affairs of the listed entity.

Place: Kolkata
Date: 15.05.2023



For **D. C. Sahoo & Co.**
Company Secretaries

(Signature)
D. C. Sahoo
Proprietor

M. No.: ACS No: 14008
CP No.: 5508

UDIN: A014008E000304298